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Darcy Hoffmeyer

ICF Consulting

Energy Efficiency Programs

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Dear Darcy,

I would like to take the opportunity to thank you for the opportunity to comment on the possible changes to Version 2.0 the specification for Energy Star Program Requirements for Exit Signs.

The current 2.0 Version does not make allowances for any other technology other than those that are capable of emitting a minimum light luminance of 8.5 cd/m2. This significantly narrows the scope of Exit sign technologies that would be eligible to be listed under the Energy Star label. One such technology is Photoluminescence. As it stands now, most North American building codes approve the use of Photoluminescent Exit Signs that operate in conjunction with existing code compliant building lighting. The NFPA Life Safety Code 101, 2000 Edition identify compliance states that the signs must be listed to UL 924 (Page 227, Section A.7.10.7.2). Considering, Energy Star requires Exit signs to conform to the NFPA Life Safety Code, it would appear that the most logical approach in this matter would program to follow the direction of the NFPA, and adopt UL924.

In the “2002 Priority Setting For New Products” report, published by the US Department of Energy in the fall of 2001, the EPA identified PL signs as a, “maximum efficiency future technology". Undoubtedly the efficiency of these products is evident, and the future is now!

UL 924 is a nationally accepted test criterion that has been developed and accepted by industry and code regulators alike. At present, Canada is in the process of adopting UL924 as a ULC standard, making 924 internationally accepted. It is also, the intent of UL to have the UL924 standard accepted as an ANSI standard. Further reason for the Energy Star program to adopt the UL924 creating harmonization on both sides of the border that indentify.

UL924 has expanded it testing protocol beyond a minimum luminance requirement to include an alternative observation visibility test, which any EXIT sign manufacturer can test to. The reason for this is to allow for the use of Photoluminescent signs. These signs technology are based on a completely different science than electrically powered exit signs, it is unlikely that any photoluminescent sign will

ever meet their minimum required luminance levels. This is not evidence that PL signs are less perceptible than conventionally powered signs; in many instances they are even more visible.

The world is ever changing, as are its technologies. These signs represent significant safety, financial, and ecological benefit to end-users. UL924 listed Photoluminescent Exit signs have clearly proven themselves to be highly suitable for their application, and unrivaled in their environmental benefits, making them a natural fit to the Energy Star Program.

Sincerely,

Kimberly Landry
LUNA Technologies International Inc.
Manufacturer of High Performance Photoluminescent Lighting Products